

MORRISON FOERSTER

250 WEST 55TH STREET
NEW YORK
NEW YORK 10019-9601

TELEPHONE: 212.468.8000
FACSIMILE: 212.468.7900

WWW.MOFO.COM

MORRISON & FOERSTER LLP
AMSTERDAM, AUSTIN, BERLIN, BOSTON,
BRUSSELS, DENVER, HONG KONG,
LONDON, LOS ANGELES, MIAMI, NEW
YORK, PALO ALTO, SAN DIEGO, SAN
FRANCISCO, SHANGHAI, SINGAPORE,
TOKYO, WASHINGTON, D.C.

April 2, 2025

Writer's Direct Contact
+1 (212) 336-4067
ELawson@mofo.com

Via ECF

The Honorable Louis L. Stanton
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-0123

Re: *Mullen Automotive, Inc., et al. v. IMC Financial Markets, et al.*
No. 1:23-cv-10637-LLS (S.D.N.Y.)

Dear Judge Stanton:

I represent Clear Street Markets LLC and Clear Street LLC, two of the four named Defendants. I write on behalf of all named Defendants, Clear Street Markets LLC, Clear Street LLC, IMC Financial Markets, and UBS Securities, LLC, pursuant to the Court's Individual Practices to request an extension of Defendants' deadline to answer the First Amended Complaint (the "FAC" (ECF No. 30)) following the Court's order denying Defendants' motion to dismiss (the "Order" (ECF No. 70)). This is Defendants' first request for an adjournment or extension of this deadline.¹

On March 28, 2025, the Court entered the Order, denying Defendants' motion to dismiss the FAC. Pursuant to Federal Rule of Civil Procedure 12(a)(4)(A), the deadline for Defendants to answer the FAC is April 11, 2025. The FAC consists of 73 pages and 216 paragraphs. In light of this volume and pursuant to Rule 1.E. of the Court's Individual Practices, Defendants request an entry of an extension to answer the FAC by April 28, 2025, which is 30 days from the date of the Order.

Counsel for Plaintiffs has consented to this request. In making this request, Defendants do not intend to waive any defenses available to them in this case, all of which are hereby preserved.

¹ The Court previously granted Defendants' request for an extension of their deadline to respond to Plaintiff Mullen Automotive, Inc.'s original complaint (ECF No. 18), as well as Defendants' request for an extension of their deadline to move to dismiss the FAC (ECF No. 32).

|||ORRISON FÖERSTER

The Honorable Louis L. Stanton
April 2, 2025
Page Two

We thank the Court for considering this request.

Respectfully submitted,

/s/ Eric D. Lawson

Eric D. Lawson